

LAW OFFICES OF THOMAS K. CROWE, P.C.

2300 M STREET, N.W.  
SUITE 800  
WASHINGTON, D.C. 20037

TELEPHONE (202) 973-2890  
FAX (202) 973-2891  
E-MAIL firm@tkcrowe.com

RECEIVED

AUG 28 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

August 28, 2002

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Reply of the Office of the Governor of the Northern Mariana Islands to Response of Pacific Telecom, Inc. to FCC Request for Further Information; IB Docket No. 02-111

Dear Ms. Dortch:

The following replies to the response to request for further information of the Federal Communications Commission ("Commission") of Pacific Telecom, Inc. ("PTI") in IB Docket No. 02-111 dated August 16, 2002. As shown below, PTI's response only underscores the reasons advanced by the Office of the Governor of the Commonwealth of the Northern Mariana Islands ("Office of the Governor") in its Petition to Deny, or, in the Alternative, to Designate for Hearing ("Petition") for denying the applications and Petition of Pacific Telecom Inc. for Declaratory Ruling Under Section 310(b)(4) of the Communications Act of 1934, as Amended ("petition for declaratory ruling").

**I. General**

The Office of the Governor reiterates its opposition to the proposed transaction as currently structured. In its Joint Opposition to Petitions to Deny and Informal Opposing Comment, PTI implies that the Office of the Governor's Petition along with other petitions may "not be all that they appear to be."<sup>1</sup> To the contrary, the Office of the Governor's Petition is precisely what it appears to be: a clear opposition to the proposed transaction for all the reasons set forth therein. In further support of its Petition, the Office of the Governor hereby includes as Exhibit A an affidavit supporting the factual underpinnings of that submission.<sup>2</sup>

<sup>1</sup> Joint Opposition to Petitions to Deny and Informal Opposing Comment, Pacific Telecom Inc. and Bell Atlantic New Zealand Holdings, Inc., filed July 1, 2002 ("Joint Opposition").

<sup>2</sup> The original affidavit is currently *en route* to this firm's office from Saipan via messenger service. A photocopy is therefore included as Exhibit A, and the original affidavit will be filed with the Commission once it is received.

No. of Copies rec'd 014  
List ABCDE

In its Joint Opposition, PTI impugns the Office of the Governor's Petition by claiming it "may have been influenced by local politics," citing to various articles attached to its Joint Opposition as Exhibit B.<sup>3</sup> For the record, the Commission should be aware that three of the five articles attached by PTI in its Joint Opposition are from a newspaper (*i.e.*, the Saipan Tribune) which the Office of the Governor understands is owned by L&T International Corporation ("L&T") or one of its affiliated companies. In the interests of full disclosure, this should have been revealed by PTI.

The record in this proceeding also convincingly demonstrates that the proposed transaction should not be approved subject to an agreement between the parties to the transaction and the U.S. government to address national security, law enforcement and/or public safety concerns. In particular, the record in this matter (*e.g.*, L&T's guilty plea to a felony charge of knowingly making materially false statements to the U.S. Department of Labor) raises serious questions as to the character and credibility of the purchasing interests, and strongly indicates that a voluntary agreement with such purchasing entities would not be reliable. Exacerbating this serious concern is the fact that PTI has already submitted inaccurate and misleading information in this proceeding. This has occurred in the instances briefly discussed below.

First, the character and reliability of PTI's 30% shareholder, THC Communications Corporation – and therefore PTI itself – is seriously undermined by the reversals contained in PTI's letter to the Commission dated July 17, 2002.<sup>4</sup> Specifically, in that letter, PTI concedes that the guilty plea to the felony charge of knowingly making materially false statements to the U.S. Department of Labor would be relevant to the Commission's review of PTI's character in the instant proceeding. It must be stressed that this acknowledgement occurred after PTI elected in its original application not to disclose this fact.<sup>5</sup> The only reason PTI made the acknowledgement was because it was forced to do so after the issue was raised by the Office of the Governor in its Petition. Also in its July 17, 2002 letter, PTI -- again reversing course -- admits that its Joint Opposition incorrectly implies that L&T's *nolo contendere* plea agreement does not constitute a felony "conviction".<sup>6</sup> In its Joint Opposition, PTI had earlier stated that "a plea of *nolo contendere* to a felony is not an adjudication of that matter and therefore should not be given significant weight in considering PTI's character qualifications."<sup>7</sup> As the Office of the Governor's Petition demonstrated, the Commission precedent does not support this.<sup>8</sup>

---

<sup>3</sup> Joint Opposition at 3.

<sup>4</sup> Letter from Kenneth D. Patrich and Timothy J. Cooney, Attorneys for Pacific Telecom Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, dated July 17, 2002 (Regarding Section 1.65 Submission; IB Docket No. 02-111) ("July 17, 2002 Letter No. 1").

<sup>5</sup> Applications of Pacific Telecom Inc. in Dkt. No. IB 02-111 (pending) ("applications").

<sup>6</sup> July 17, 2002 Letter No. 1 at 2.

<sup>7</sup> Joint Opposition at 25.

<sup>8</sup> Petition at 20, n. 51 (citing *In re* Policy Regarding Character Qualifications in Broadcast

Second, the reliability of PTI's 20% shareholder, Missouri Holdings, Inc. – and indirectly PTI itself – is also undermined by the reversal contained in PTI's second letter to the Commission dated July 17, 2002.<sup>9</sup> In that letter, PTI admits that it had previously failed to disclose that Michael Kai Leung is also a British National Overseas citizen in Hong Kong (not just a Canadian citizen as stated in the filed applications and petition for declaratory ruling).<sup>10</sup> Collectively, these reversals emphatically underscore one of the major issues in this proceeding – the truthfulness and credibility of the purchasing party, PTI and its shareholders. At a minimum, it raises the question of what other inaccurate information has been inadvertently reflected in the applications and petition for declaratory ruling.

It is also important to recognize that potentially serious procedural deficiencies appear to currently plague the applications and petition for declaratory ruling as a result of new information submitted by the applicants/petitioners to correct the inaccuracies discussed above and in response to the FCC's August 1, 2002 request for further information.<sup>11</sup> For example, as indicated above, PTI revealed that Michael Kai Leung is also a British National Overseas citizen in Hong Kong (not just a Canadian citizen as stated in the filed applications and Petition for Declaratory Ruling).<sup>12</sup> Yet, the petition for declaratory ruling and applications apparently still bear the previously-filed inaccurate citizenship information. In addition, the reversals pertaining to the fact that the guilty plea to the felony charge of knowingly making materially false statements to the U.S. Department of Labor would be relevant to the Commission, are also not reflected in any amendments to the applications or petition for declaratory ruling. Significantly, the Commission's more recent August 1, 2002 Request expressly asked that PTI amend the petition for declaratory ruling and applications, where appropriate, to reflect any responses to that letter.<sup>13</sup> Notwithstanding this, PTI has failed to amend any of these filings with the material information submitted in its August 16, 2002 response letter or any of its previous submissions. No further action in this matter can be taken until the applications and petition are appropriately amended.

---

Licensing, *Memorandum Opinion and Order*, 6 FCC Rcd. 3448, 3451, n. 3 (1991).

<sup>9</sup> Letter from Kenneth D. Patrich and Timothy J. Cooney, Attorneys for Pacific Telecom Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, dated July 17, 2002 (Regarding IB Docket No. 02-111) ("July 17, 2002 Letter No. 2").

<sup>10</sup> *Id.* at 1.

<sup>11</sup> Letter from James L. Ball, Chief, Policy Division, to Kenneth D. Patrich and Timothy J. Cooney, Attorneys for Pacific Telecom Inc., dated August 1, 2002 ("August 1, 2002 Request").

<sup>12</sup> *See supra*; July 17, 2002 Letter No. 2 at 1.

<sup>13</sup> August 1, 2002 Request at 1.

## **II. FCC Information Requests**

The following contains the reply of the Office of the Governor to the responses of PTI to the specific questions set forth in the Commission's August 1, 2002 Request.

### **A. PTI Response to Question No. 1**

It should be noted that the Shareholders' Agreement vests significant potential for control over PTI in THC Communications Corp. Although THC Communications Corp. owns only a 30% shareholder stake in PTI, it has the right to appoint 3 of the 6 directors of PTI (Article 6). Furthermore, under the Shareholders' Agreement, only THC Communications Corp. has the important right to appoint a Comptroller and/or internal and external auditors of PTI (Article 8).<sup>14</sup> In the event of a sale of any shareholder's interest in PTI, the other shareholders' shall have a right of first refusal to purchase such shareholder's shares (Article 4). This creates the potential, for example, to allow THC Communications Corp., to acquire the 50% shareholder stake of Prospector Investment Holding, Inc. These rights give THC Communications Corp. a significantly higher level of potential control over operation of PTI than might otherwise be implied by its 30% ownership stake. This potential to control or influence the actions of PTI, particularly the authority to appoint a comptroller and internal or external auditors of PTI, takes on a higher level of concern in light of the character and reliability issues which surround THC Communications Corp.<sup>15</sup>

Significantly, the Shareholders' Agreement is not subject to U.S. law. For example, the Shareholders' Agreement is governed by the laws of Singapore (Article 11) and any arbitration shall be held in Singapore (Article 10).

### **B. PTI Response to Question No. 2**

In its Joint Opposition, PTI argues that the relationship between L&T, the defendant in the criminal action, and PTI, is attenuated and therefore should not render PTI unqualified to hold the subject Commission licenses. This fact is undermined by the fact that the conditions of probation contained in the Criminal Judgment are broadly framed and apply to "related corporations" which would appear to include PTI.

---

<sup>14</sup> THC Communications Corp.'s right to appoint PTI's comptroller is particularly significant here due to the fact that the materially false statements at issue in L&T's *nolo contendere* plea were related to management of employee payroll, a responsibility typically overseen by a company's comptroller. The fact that THC Communications Corp. also has the right to appoint internal and external auditors, thereby undermining any independent oversight, serves to compound this concern.

<sup>15</sup> See *supra* at 2.

### **C. PTI Response to Question No. 3**

PTI's request for confidential treatment of the entire purchase agreement contained in its August 16, 2002 letter should be denied. As offered in PTI's letter filed with the Commission on August 16, 2002, the Commission should instead require that PTI resubmit the agreement as a public document with the purchase price, assumed working capital and financial attachment (to the extent they do not contain information relevant to the issues raised in this proceeding) redacted.<sup>16</sup>

### **D. PTI Response to Question No. 5**

The information supplied in response to this request does not provide sufficient information to ascertain the identities of the members of the Tan Family Trusts. The Commission specifically asked PTI to identify the "beneficiaries of each of the Tan Family Trusts, including their citizenship and entitlement, in percentage terms, under the relevant trust".<sup>17</sup> PTI's response lists 37 beneficiaries. Assuming that beneficiaries with identical names are, in fact, the same person, 28 unique beneficiaries appear to be named in PTI's response. However, in its petition for declaratory ruling, PTI states that there are only 27 beneficiaries of the Tan Family Trusts.<sup>18</sup> Ascertaining which individuals comprise the 27 beneficiaries referenced in PTI's petition for declaratory ruling is not possible from the information provided. PTI should clarify the apparent discrepancy between the information contained in its response and its petition for declaratory ruling.<sup>19</sup>

### **E. PTI Response to Question No. 7**

This question has not been satisfactorily answered. First, no market share information – only a simple statement which does not address the Commission's request – has been supplied for the wireless market. The Office of the Governor understands that only two wireless providers have systems in the CNMI, Verizon Micronesia, the wireline provider, and Guam Cellular and Paging, Inc. d/b/a Saipancell ("Saipancell"), the non-wireline provider. Verizon is well-established as the dominant cellular provider in the CNMI, and Saipancell does not even offer service on the islands of Tinian and Rota. The Office of the Governor also understands that while PCS licenses have been issued covering the CNMI market, no PCS provider is currently offering service.

---

<sup>16</sup> August 16, 2002 Letter at 2.

<sup>17</sup> August 1, 2002 Request at 2.

<sup>18</sup> Petition for declaratory ruling at 3.

<sup>19</sup> More importantly, however, PTI fails to supply copies of the trust agreements which could be used to verify and confirm the ownership interests in THC Communications Corp. *See also* Petition at 22-23. In light of the inaccurate information already submitted in this proceeding as well as the discrepancy within PTI's own submissions regarding the number of Tan Family Trust beneficiaries, the Commission should require that copies of the trust agreements be filed.

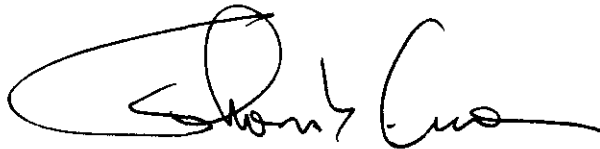
Marlene H. Dortch  
August 28, 2002  
Page 6

Second, incomplete and potentially misleading information was supplied for the long distance market. Specifically, the supplied long distance market share information (Originating Access Minutes) appears to be an aggregate figure that may be skewed by an excessively large amount of dial around calls. These calls appear to consist largely of 1) calls to prepaid calling card providers used by many tourists and visitors; and 2) credit card verification calls to 800 numbers. It is not apparent whether these minutes include presubscribed 1+ originating minutes. The Office of the Governor submits that presubscribed line information should be specifically requested and utilized as the best identifier of long distance market share. The Office of the Governor believes that Verizon Pacifica is unquestionably the dominant provider of presubscribed long distance services, with an excess of 90% of the CNMI market.

Finally, we submit that PTI's response on Page 3 of its letter regarding the failure of any competitor to enter the wireline local exchange carrier market should be construed as an admission that Verizon Micronesia holds a 100% market share (*i.e.*, sole source monopoly) in the local market.

Please contact the undersigned counsel if you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Gregory E. Kunkle', written over a horizontal line.

Thomas K. Crowe  
Gregory E. Kunkle,  
Counsel for the Office of the Governor  
of the Commonwealth of the Northern  
Mariana Islands

cc: Attached Service List

## **EXHIBIT A**

## AFFIDAVIT

State of \_\_\_\_\_ :

ss.

County of \_\_\_\_\_ :

Robert Schwalbach, Affiant, being duly sworn according to law, deposes and says that:  
I am a Senior Policy Advisor in the Office of the Governor, Commonwealth of the Northern Mariana Islands, and am fully authorized to execute this affidavit on behalf of the Office of the Governor. I, accordingly, attest as follows:

The telecommunications network in the Commonwealth of the Northern Mariana Islands ("Commonwealth") is a sole-source, monopoly network. Competition is virtually non-existent.

To date, Micronesia Telecommunications Corporation ("MTC") is the only company authorized under the Commonwealth's telecommunications law (Commonwealth Telecommunications Act, Pub. L. No. 12-39, H.B. No. 12-006 (2001)) to provide local service. Local service between the islands of Saipan, Tinian, and Rota is provided over a fiber optic submarine cable owned exclusively by GTE Pacifica Inc. ("GTE Pacifica"). Only a limited number of wireless service alternatives exist in the Commonwealth, as GTE Pacifica is the dominant provider.

GTE Pacifica also controls access off the islands of the Commonwealth by means of its exclusive ownership of C-band transmit/receive earth stations as well as a fiber optic submarine cable connecting the Commonwealth with Guam and, in turn, the rest of the world. Only limited domestic and international off-island competition exists.



Since the Commonwealth's telecommunications network is a sole-source, monopoly network, its critical infrastructure services, including 911 public safety services and other vital private sector services, are largely dependent upon that network.

The U.S. military and federal government have a significant interest in the Commonwealth. The federal government leases approximately 18,182 acres of land in the Commonwealth, which is used for military purposes. The U.S. Navy and Marines use some of this land to conduct joint training exercises, including the use of troops, ships and aircraft, to maintain the combat readiness of "forward deployed" military units. Farallon de Medinilla is the only live-fire training location used by the U.S. military in the western Pacific. In addition, several military pre-positioning ships are routinely stationed just off the coast of Saipan, available for deployment wherever the equipment and supplies they contain are strategically needed in the region.

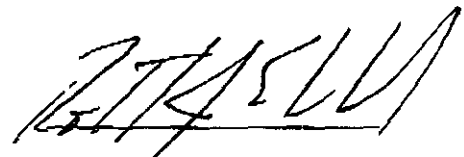
The federal government itself has a significant presence in the Commonwealth. The following U.S. government entities have Commonwealth office locations: Department of Defense, Department of Interior, Department of Justice, Department of Transportation, Department of Labor, Department of Agriculture, Social Security Administration, U.S. National Labor Relations Board, U.S. Postal Service, U.S. Probation, U.S. District Court, and International Broadcasting Bureau ("IBB"). While the U.S. military maintains its own communications capabilities, certain military functions and federal government operations in the Commonwealth appear to depend on the sole-source telecommunications network.

The IBB owns and operates 3 transmitters in Saipan and 8 in Tinian that are used by Voice of America ("VOA") and Radio Free Asia ("RFA") to rebroadcast signals within the Pacific Rim. These transmitters are independent of the monopoly telecommunications network;

however, both VOA and RFA appear to depend upon the network for communications within the Commonwealth and to the outside world.

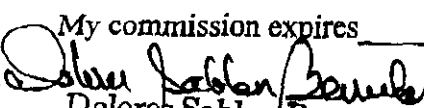
Under the current corporate structure of Verizon Communications Inc., the company has substantial operations both in the mainland U.S. and, through MTC and GTE Pacifica, in the Commonwealth, facilitating integration of rates across corporate affiliates in a manner that has introduced service offerings and pricing to the Commonwealth market which are comparable to those available in the mainland U.S. This will not be the case with Pacific Telecom Inc., which will have no mainland U.S. operations. The rates established by MTC, as the dominant off-island service provider, serve as a benchmark integration rate for the handful of small competitors that offer long distance services in the Commonwealth and, in effect, "discipline the marketplace."

The facts above set forth are true and correct to the best of my knowledge, information, and belief.

  
Signature of Affiant

Sworn and subscribed before me this 23rd day of August, 2002.

\_\_\_\_\_  
Signature of Official administering oath

My commission expires \_\_\_\_\_  
  
Dolores Sahlan Bermudes  
NOTARY PUBLIC  
Commonwealth of the Northern Mariana Islands  
My Commission expires: March 26, 2003



## CERTIFICATE OF SERVICE

I, Yeshaya S. Reiter, a legal assistant with the Law Offices of Thomas K. Crowe, P.C., certify that on August 28, 2002, a copy of the foregoing *Reply of the Office of the Governor of the Northern Mariana Islands to Response of Pacific Telecom, Inc. to FCC Request for Further Information; IB Docket No. 02-111* was served by first class United States mail, postage prepaid, upon the parties listed below.

Michael K. Powell  
Chairman, Federal Communications  
Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20054

Kathleen Q. Abernathy  
Commissioner, Federal Communications  
Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20054

Michael J. Copps  
Commissioner, Federal Communications  
Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20054

Kevin J. Martin  
Commissioner, Federal Communications  
Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20054

Daniel K. Akaka  
United States Senator, Hawaii  
141 Hart Senate Office Building  
Washington, D.C. 20510

Daniel Inouye  
United States Senator, Hawaii  
Chairman, United States Subcommittee on  
Communications  
722 Hart Building  
Washington, D.C. 20510-1102

Ernest F. Hollings  
United States Senator, South Carolina  
Chairman, United States Committee on  
Commerce, Science and Transportation  
Room SD-508  
Washington, D.C. 20510-6125

Robert A. Underwood  
United States Representative, United States  
Territory of Guam  
2428 Rayburn House Office Building  
Washington, D.C. 20515-5301

Fred Upton  
United States Representative, Michigan  
Chairman, United States Subcommittee on  
Telecommunications and the Internet  
2125 Rayburn House Office Building  
Washington, D.C. 20515

W.J. Tauzin  
United States Representative, Louisiana  
Chairman, United States Committee on  
Energy and Commerce  
2125 Rayburn House Office Building  
Washington, D.C. 20515

Carl T.C. Gutierrez  
Governor, Territory of Guam  
P.O. Box 2950  
Hagatna, Guam 96932

Marvin M. Dodge  
Commander, U.S. Navy  
Assistant Chief of Staff for Civil-Military  
Affairs  
U.S. CINCPAC REP Guam, CNMI, FSM &  
Palau  
Attn: Code N5  
PSC 455 Box 152  
FPO AP 96540-1000

Josephine Scarlett, Office of Chief Counsel  
National Telecommunications &  
Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue N.W.,  
Room 4713  
Washington, D.C. 20230

Paul R. Schwedler  
Trial Attorney (General)  
Defense Information Systems Agency  
702 South Courthouse Rd.  
Arlington, V.A. 22204-2199

Jeannine R. Aguon  
Senior Legislative Assistant  
2428 Rayburn Building  
Washington, D.C. 20515

Marsha MacBride  
Director, Homeland Security Policy Council  
Federal Communications Commission  
Office of the Chairman  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Larry R. Parkinson  
General Counsel  
Federal Bureau of Investigation  
935 Pennsylvania Avenue, N.W.  
Washington, D.C. 20535

James Lovelace  
Federal Bureau of Investigation  
935 Pennsylvania Avenue NW  
Suite 7877  
Washington, D.C. 20535

Office of the U.S. Coordinator for  
International Communication and  
Information Policy  
U.S. Department of State  
Mail Code: EB/CIP  
2201 C Street, N.W.  
Room 4826  
Washington, D.C. 20520-5820

David B. Cohen  
Deputy Assistant Secretary for Insular  
Affairs  
Office of Insular Affairs  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

Jack Zinman  
Senior Advisor, Office of the Assistant  
Secretary for Communications and  
Information  
National Telecommunications &  
Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue N.W.  
Room 4898B  
Washington, D.C. 20230

Kent R. Nilsson  
Special Counsel and Deputy Chief  
Network Technologies Division  
Office of Engineering and Technology  
Federal Communications Commission  
445 12th Street, SW  
Room 7B452  
Washington, D.C. 20554

Robert F. Kelley, Jr.  
Advisor to the Governor  
Office of the Governor  
Territory of Guam  
P.O. Box 2950  
Hagatna, Guam 96910

Richard Salgado  
Trial Attorney  
Computer Crime Section  
U.S. Department of Justice  
1301 New York Avenue, N.W.  
Suite 600  
Washington, D.C. 20053

Dorothy Attwood  
Chief, Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Gardner Foster  
Federal Communications Commission  
Policy Division, International Bureau  
445 12<sup>th</sup> Street, S.W.  
Room 3-A625  
Washington, D.C. 20554

Susan O'Connell  
Federal Communications Commission  
Policy Division, International Bureau  
445 12<sup>th</sup> Street, S.W.  
Room 6-A847  
Washington, D.C. 20554

John Branscome  
Federal Communications Commission  
Commercial Wireless Division  
Wireless Telecommunications Bureau  
445 12<sup>th</sup> Street, S.W.  
Room 4-A161  
Washington, D.C. 20554

Erin McGrath  
Federal Communications Commission  
Commercial Wireless Division  
Wireless Telecommunications Bureau  
445 12<sup>th</sup> Street, S.W.  
Room 4-B454  
Washington, D.C. 20554

Tracey Wilson  
Federal Communications Commission  
Competition Policy Division  
Wireline Competition Bureau  
445 12<sup>th</sup> Street, S.W.  
Room 5-C437  
Washington, D.C. 20554

Neil A. Dellar  
Federal Communications Commission  
Transaction Team, Office of the General  
Counsel  
445 12<sup>th</sup> Street, S.W.  
Room 8-C818  
Washington, D.C. 20554

James L. Ball  
Chief, Policy Division  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room 6C-749  
Washington, D.C. 20554

David Strickland  
Policy Division, International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room 6-A847  
Washington, D.C. 20554

Representative Jesus T. Attao  
House of Representatives  
Thirteenth Northern Marianas  
Commonwealth Legislature  
Commonwealth of the Northern  
Mariana Islands  
Post Office Box 500586  
Saipan, MP 96950-0586

Representative Joe P. Deleon Guerrero  
House of Representatives  
Thirteenth Northern Marianas  
Commonwealth Legislature  
Commonwealth of the Northern  
Mariana Islands  
Saipan, MP 96950-0586

Representative Gloria Dlc. Cabrera  
House of Representatives  
Thirteenth Northern Marianas  
Commonwealth Legislature  
Commonwealth of the Northern  
Mariana Islands  
Post Office Box 500586  
Saipan, MP 96950-0586

Representative Stanley T. Torres  
House of Representatives  
Thirteenth Northern Marianas  
Commonwealth Legislature  
Commonwealth of the Northern  
Mariana Islands  
Post Office Box 500586  
Saipan, MP 96950-0586

Representative Andrew S. Sala  
House of Representatives  
Thirteenth Northern Marianas  
Commonwealth Legislature  
Commonwealth of the Northern  
Mariana Islands  
Post Office Box 500586  
Saipan, MP 96950-0586

Representative Benjamin B. Seman  
House of Representatives  
Thirteenth Northern Marianas  
Commonwealth Legislature  
Commonwealth of the Northern  
Mariana Islands  
Post Office Box 500586  
Saipan, MP 96950-0586

Diego T. Benavente  
Lt. Governor  
Commonwealth of the Northern  
Mariana Islands  
Box 10007  
Saipan, MP 96950

Diego M. Songao, Chairman  
CNMI Senate Committee on Public Utilities,  
Transportation and Communications  
Commonwealth Legislature  
Commonwealth of the Northern  
Mariana Islands  
Saipan, MP 96950-0586

Patrick W. Kelley  
Deputy General Counsel  
Federal Bureau of Investigation  
935 Pennsylvania Avenue, N.W.  
Washington, D.C. 20535

John G. Malcolm  
Deputy Assistant Attorney General  
Criminal Division  
United States Department of Justice  
10<sup>th</sup> Street & Constitution Avenue, N.W.  
Washington, D.C. 20530

Anthony A. Das  
Senior Vice President/Managing Director  
For Asia and the Pacific  
PCI Communications, Inc.  
135 Chalan Santo Papa, Suite 101  
Hagatna, GU 96910

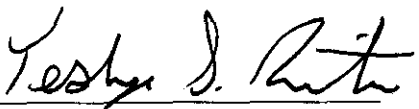
Christopher M. Bennett  
General Counsel and Secretary  
Bell Atlantic New Zealand Holdings, Inc.  
1095 Avenue of the Americas  
Room 3828  
New York, N.Y. 10036

George Chiu  
Director and Authorized Representative  
Pacific Telcom, Inc.  
P.O. Box 501280  
Saipan, MP 96950

Qualex International  
445 12<sup>th</sup> Street, S.W.  
Room CY-B402  
Washington, D.C. 20554

Kenneth D. Patrich  
Timothy J. Cooney  
Wilkinson Barker Knauer, LLP  
2300 N Street, N.W.  
Suite 700  
Washington, D.C. 20037

Peter D. Shields  
Jennifer D. Hindin  
Wiley Rein & Fielding, LLP  
1776 K Street, N.W.  
Washington, D.C. 20006

  
Yeshaya S. Reiter